**RPM International Inc.**

**Cookie Policy**

**Last Updated**: April 17, 2023

RPM International Inc. (the “**Company**”) owns, licenses, and operates certain websites, online tools, applications, and platforms (each a “**Site**”) that are primarily designed to sell and provide specialty coatings, sealants, building materials and related services (collectively, the “**Services**”). This Cookie Policy explains our use of “cookies” and other tracking technologies, including, but not limited to, web beacons, pixels, clear gifs, and other similar technologies (collectively, “**Cookies and Other Tracking Technologies**”) that are employed on our Sites.

PLEASE READ THIS COOKIE POLICY CAREFULLY AS IT DESCRIBES YOUR RIGHTS, RESPONSIBILITIES, AND LIABILITIES. BY ACCESSING OR USING THE SITE, YOU ARE CONSENTING TO THE TERMS OF THIS COOKIE POLICY AND THE COMPANY’S [TERMS OF USE](https://www.rpminc.com/terms-of-use/) AND [PRIVACY POLICY](https://www.rpminc.com/privacy-policy/).

To prevent THE COMPANY FROM using certain Cookies and Other Online Tracking Technologies, YOU CAN CHANGE YOUR BROWSER SETTINGS IN ACCORDANCE WITH THE INSTRUCTIONS BELOW OR BY USING OUR COOKIE PREFERENCE CENTER LOCATED ON OUR SITES.

1. **What are Cookies and Other Online Tracking Technologies?**

Cookies are small files that are downloaded to your device when you visit a website. The cookie then sends information back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Other types of tracking technologies work similarly to cookies and place small data files on your devices or monitor your website activity to enable us to collect information about how you use our Sites. Accordingly, Cookies and Other Tracking Technologies allow our Sites to recognize your device and track your activities and preferences, thereby allowing you to navigate between pages efficiently and to generally improve your experience. The information provided below about cookies also applies to the other tracking technologies referenced above (i.e., web beacons, pixels, clear gifs, and other similar technologies). You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org).

Cookies are often categorized by function. We use four types of cookies by function on our Sites:

|  |  |
| --- | --- |
| **Name** | **Description** |
| Essential (or Necessary) Cookies | These cookies are necessary for the website to function and cannot be switched off on our Sites. They are typically set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the Site will not work as a result.  |
| Analytical/Performance Cookies | These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site.    All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site and will not be able to monitor its performance. |
| Functional Cookies | These cookies enable the website to provide enhanced functionality and personalization. For example, within our Sites, these cookies remember users’ language preferences. They may be set by us or by third party providers whose services we have added to our pages.    If you do not allow these cookies, then some or all of these services may not function properly. |
| Targeting/Advertising Cookies | These cookies are used to deliver advertisements relevant to a specific user of the Sites. They remember that a user has visited a website and share this information with other organizations such as advertising vendors. These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites.    They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising. |

Cookies can also be categorized by how long they remain on your device and by who puts the cookie there. There are four broad categories of duration and placement cookies that we use on the Sites:

|  |  |
| --- | --- |
| **Name** | **Description** |
| Persistent Cookies | Persistent cookies remain on your device until deleted manually or automatically. |
| Session Cookies | Session cookies remain on your device until you close your browser, at which time they are automatically deleted. |
| First-Party Cookies | These cookies are placed by the party operating the website or service. For example, any cookies we place on your computer from our Sites are first-party cookies. |
| Third-Party Cookies  | These cookies are placed on a website or service by a party that does not own or operate the Site.  |

1. **How do our Sites use Cookies and Other Tracking Technologies?**

We use Cookies and Other Tracking Technologies to identify you and your interests, to remember your preferences, to facilitate our marketing, and to track your use of our Sites. We also use Cookies and Other Tracking Technologies to control access to certain content on our Sites, to protect the integrity and security of the Sites, to process any requests that you make of us, and as otherwise set forth herein and in the Company’s [Privacy Policy](https://www.rpminc.com/privacy-policy/). To administer our Sites and for research purposes, the Company may, from time to time, contract with third-party service providers to track and analyze statistical usage and volume information from our Sites. These third-party service providers use persistent cookies to help us improve the user experience, manage the content on our Sites, and analyze how users navigate and utilize the Sites. The Cookies and Other Tracking Technologies we use on <https://www.rpminc.com/> are as follows:

| **Cookie** | **Type** | **Description** | **Duration** |
| --- | --- | --- | --- |
| \_\_cf\_bm | Functional | This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.  | 30 minutes |
| \_ga\_W94634ZZJ1 | Analytics | This cookie is installed by Google Analytics. | 2 years |
| \_ga | Analytics | The \_ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors. | 2 years |
| \_gid | Analytics | Installed by Google Analytics, \_gid cookie stores information on how visitors use a website, while also creating analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously. | 1 day |
| \_gat\_gtag\_UA\_50750324\_1 | Analytics | Set by Google to distinguish users. | 1 minute |
| \_\_uxq412\_\_id.397f | Functional | Set by Q4 to maintain investor information from 3rd party site.  | 2 years |
| \_\_uxq412\_\_ses.397f | Functional | Set by Q4 to maintain investor information from 3rd party site. | 30 minutes |
| sp | Advertisement | This cookie is set by the host c.jabmo.app. This cookie is used to serve the content based on user interest and improve content creation. | 1 year |

**Google Ads and Analytics***.*We use “Google Analytics” to collect information about the use of our Sites. Google Analytics collects information such as how often users visit the Sites, what pages they visit when they do so, and what other sites they used prior to coming to the Sites. We use the information we get from Google Analytics only to improve our Sites. Google Analytics collects only the IP address assigned to your device on the date you visit our Sites rather than your name or other personal information. We do not combine the information collected through the use of Google Analytics with other personal information. Although Google Analytics plants a cookie on your web browser to identify you as a unique user the next time you visit our Sites, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to our Sites is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to the Sites by disabling cookies on your browser or using our Cookie Preference Center. Along with cookies, Google Analytics also uses electronic images known as web beacons (sometimes called single pixel gifs) to compile aggregated statistics to analyze how our Sites are used. You can find additional information on how to install a browser add-on to prevent your data from being used by Google Analytics at tools.google.com/dlpage/gaoptout.

1. **How DO WE Use and SharE information?**

The information and data we gather from our Cookies and Other Tracking Technologies will be used, retained, and shared in accordance with this Cookie Policy and the Company’s [Privacy Policy](https://www.rpminc.com/privacy-policy/).

1. **Rejecting Cookies AND YOUR OPTIONS**

To prevent THE COMPANY FROM using certain Cookies and Other Online Tracking Technologies, YOU CAN CHANGE YOUR BROWSER SETTINGS IN ACCORDANCE WITH THE INSTRUCTIONS BELOW OR BY USING OUR COOKIE PREFERENCE CENTER AVAILABLE ON THE FOOTER OF OUR SITE.

You can stop cookies from being downloaded on your device by selecting the appropriate settings on your browser. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. You can find out how to do this for your particular browser by clicking “help” on your browser’s menu or by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org/). Please note, however, that without cookies you may not be able to access or take full advantage of the Sites. Most browsers allow users to use a “private mode” by which cookies are deleted after your website visit. Please read the help section of your browser to learn more about how to activate the “private mode.” You could still visit our Sites if your browser is in “private mode”; however, the user experience may not be optimal, and some features may not work.

* [Click here](https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences) to learn more about the “Private Browsing” setting and managing cookie settings in Firefox.
* [Click here](http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647) to learn more about “Incognito” and managing cookie settings in Chrome.
* [Click here](http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies) to learn more about “InPrivate” and managing cookie settings in Internet Explorer.
* [Click here](https://support.apple.com/en-us/HT201265) to learn more about “Private Browsing” and managing cookie settings in Safari.

If you want to remove previously stored cookies, you can manually delete the cookies at any time. However, this will not prevent the Sites from placing further cookies on your device unless and until you adjust your browser setting as described above. For more information on how to manually delete cookies, please see [https://us.norton.com/blog/how-to/how-to-clear-cookies#](https://us.norton.com/blog/how-to/how-to-clear-cookies).

**More Information**. You can find more information about cookies, behavioral advertising, and online privacy at [www.allaboutcookies.org](http://www.allaboutcookies.org). For some of our service providers that participate in the Digital Advertising Alliance (DAA), you can exercise your choice to opt out of interest-based advertising at <http://optout.aboutads.info>. You may also opt out of receiving interest-based ads from many third-party websites and applications through the Network Advertising Initiative’s (NAI) Opt Out Tool, which is available at <http://www.networkadvertising.org/choices>. Certain types of mobile devices have an identifier that provides organizations with the ability to serve targeted advertising directly to a specific mobile device, and you may (depending on the device) be able to limit advertising, reset the advertising identifier, and turn off your device’s tracking features within your device’s settings. For more information see <http://youradchoices.com/appchoices>.

1. **California Privacy Rights**

Data Privacy Rights. Pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (“CCPA”), California residents are entitled to the following data privacy rights:

* *Right to Know* (Specific Pieces of Personal Information). You have the right to know the specific pieces of your personal information that we have collected about you.
* *Right to Know* (Categories of Personal Information). You have the right to know (i) the categories of personal information we have collected from you; (ii) the categories of sources from which the personal information is collected; (iii) the categories of your personal information we have sold or disclosed for a business purpose; (iv) the categories of third parties to whom your personal information was sold or disclosed for a business purpose; and (v) the business or commercial purpose for collecting or selling your personal information.
* *Right to Delete*. You have the right to request that we delete your personal information that we have collected and retain.
* *Right to Correct*. You have the right to request that we correct inaccurate personal information that we have collected and retain.
* *Nondiscrimination*. You have the right not to be subject to discrimination for asserting your rights under the CCPA.

Submit a Privacy Request. To submit a privacy request, you may contact us using any of the following means: (email) dataprotection@rpminc.com, (webform) <https://rpminc.com/contact/>, (telephone) 1 (800) 776-4488, or (mail) RPM International Inc., ATTN: Privacy Request, 2628 Pearl Road, Medina, OH 44256. If you would prefer, you may designate an authorized agent to submit a CCPA privacy request on your behalf. An authorized agent must be registered with the California Secretary of State to conduct business in California.

Privacy Request Verification Process. If you (or your authorized agent) make any request related to your personal information, the Company will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. In particular, the Company will, to the extent required or permitted by law, require you (or your authorized agent) to verify your request via email, request certain contact information or government identifiers, and we will match at least two pieces of such personal information with data that we have previously collected from you before granting you access to, erasing, or correcting, specific pieces or categories of personal information, or otherwise responding to your request. We may require written documentation that demonstrates a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein, unless you have provided the authorized agent with power of attorney pursuant to California Probate Code §§ 4121 to 4130. None of the CCPA’s rights are absolute, and such rights are subject to legal and regulatory exceptions and exemptions. For more information about the CCPA, please see: <https://oag.ca.gov/privacy/ccpa>.

Opt-Out Rights / Do Not Sell My Personal Information. California residents have the right to opt out of the “sale” of their personal information. However, the Company does not sell your personal information to third parties for profit or monetary or other valuable consideration, and therefore we do not provide opt-out request processes for the sale of personal information (because we do not undertake such activities).

Opt-Out Rights / Do Not Share My Personal Information. California residents have the right to opt out of the “sharing” of their personal information. The Company uses third-party analytical and targeted advertising features on our Site and similar web tools provided by our marketing partners, and such features, tools and marketing relationships involve the disclosure of your personal information to third parties and may constitute the “sharing” of your personal information for CCPA purposes. To opt out of this sharing of your personal information in these circumstances, please click on the Cookie Preference Center link on the footer of the Site to set your cookie preferences. You, or your authorized agent, may also contact us in accordance with the “Contact Us” section listed below.

Children. The Site is not directed at, and should not be used by, minors under the age of eighteen (18), and therefore the Company does not knowingly sell or share the personal information of minors under eighteen (18) years of age.

Limit Use of Sensitive Personal Information. The Company does not use or disclose sensitive personal information for reasons other than those set forth in the CCPA, and therefore we do not provide individuals with the ability to limit how we use or disclose such sensitive personal information.

1. **Virginia Privacy Rights**

Data Privacy Rights. Pursuant to the Virginia Consumer Data Protection Act, Virginia residents are entitled to certain data privacy rights:

* To confirm whether or not the Company is processing your personal information, and to access such personal information.
* To request the Company correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.
* To request the Company delete your personal information.
* To obtain a copy of the personal information that you previously provided the Company in a portable and, to the extent technically feasible, readily usable format that allows it to be transmitted to another entity without hindrance, where the processing is carried out by automated means.

Submit a Privacy Request. To submit a privacy request, you may contact us using any of the following means: (email) dataprotection@rpminc.com, (webform) <https://rpminc.com/contact/>, (telephone) 1 (800) 776-4488, or (mail) RPM International Inc., ATTN: Privacy Request, 2628 Pearl Road, Medina, OH 44256.

Privacy Request Verification Process. If you (or your authorized agent) make any request related to your personal information, the Company will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. In particular, the Company will, to the extent required or permitted by law, require you (or your authorized agent) to verify your request via email, request certain contact information or government identifiers, and we will match at least two pieces of such personal information with data that we have previously collected from you before granting you access to, erasing, or correcting, specific pieces or categories of personal information, or otherwise responding to your request. None of Virginia’s privacy rights are absolute, and such rights are subject to legal and regulatory exceptions and exemptions. For more information about the Virginia Consumer Protection Act, please see: <https://lis.virginia.gov/cgi-bin/legp604.exe?211+ful+SB1392ES1>.

Privacy Requests Appeals Process. If you would like to appeal a decision the Company has made with respect to your privacy request, please (email) dataprotection@rpminc.com, with the subject line “PRIVACY REQUEST: APPEALS” and describe the nature of your request, and the reason requesting an appellate review.

Opt-Out Rights / The Sale of Personal Information. Virginia residents have the right to opt out of the “sale” of their personal information. However, the Company does not sell your personal information to third parties for or monetary consideration, and therefore we do not provide opt-out request processes for the sale of personal information (because we do not undertake such activities).

Opt-Out Rights / Targeted Advertising. Virginia residents have the right to opt out of having their personal information used for targeted advertising purposes. The Company uses third-party analytical and targeted advertising features on our Site and similar web tools provided by our marketing partners. To opt out of this sharing of your personal information in these circumstances, please click on the Cookie Preference Center link on the footer of the Site to set your cookie preferences.

Opt-Out Rights / Profiling. Virginia residents have the right to opt out of having their personal information used for profiling in furtherance of decisions that produce legal or similarly significant effects. However, the Company does not engage in such activities.

1. **European Union (EU), Switzerland, and United Kingdom (UK)**

Data Protection Rights. If you are located in the EU, Switzerland, or the UK, you have the following data protection rights:

* *Right to Know*: The right to know about what personal information the Company collects and processes about you, including the types and categories of personal information we collect and process, the sources of such personal information, our retention criteria, with whom we share your personal information, cross-border data transfers, and how to file complaints and inquiries. The personal information that we collect from you, the purposes for which it is used, the source of such personal information, and the parties to whom we share your personal information, among other issues, are set forth in this Cookie Policy and in our Privacy Policy.
* *Access Rights*. You may ask us whether we process any of your personal information and, if so, receive access to such personal information. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal information concerned as well as any other information necessary for you to exercise the essence of this right.
* *Rectification*. You have the right to have your personal information corrected/rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal information about you and, taking into account the purposes of the processing, update any incomplete personal information, which may include the provision of a supplementary statement.
* *Erasure*. You have the right to have your personal information erased, which means the deletion of your personal information by us and, where possible, any other controller to whom your data has previously been disclosed. However, your right to erasure is subject to statutory limits and prerequisites (e.g., where your personal information is no longer necessary in relation to the initial purposes for which it was processed, your personal information was processed unlawfully).
* *Restriction of Processing*. You have the right to obtain the restriction of the processing of your personal information, which means that we suspend the processing of your personal information for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal information is contested, but we need time to verify the inaccuracy (if any) of your personal information.
* *Data Portability*. You have the right to request us to provide you with your personal information in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible.
* *Right to Object*. You have the right to object to the processing of your personal information, which means you may request us to no longer process your personal information. This only applies in case the “legitimate interests” ground (including profiling) constitutes the legal basis for processing (see below “Legal Basis for Processing”). However, at any time (and free of charge) you can object to having your personal information processed for direct marketing purposes.
* *Withdrawing Consent*. You also may withdraw your consent at any time if we are solely relying on your consent for the processing of your personal information. However, this will not impact our legal basis to process such personal information prior to the withdrawal of your consent.
* *Automated Decision Making*. The Company does not engage in any activity that subjects our customers, Site users, survey participants, or others to a decision based solely on automated processing, including profiling, which produces legal effects, or similarly significantly results, impacting them.

To exercise any of these data privacy rights, please contact us, or have your designated agent contact us, in accordance with the “Contact Us” section listed below. To the extent permitted by law, we will need to verify your identity (or the identity of your agent) and ensure the authenticity of your request.

Legal Basis for Processing. We process your personal information in accordance with the legal bases set forth in law. For example, our processing of personal information (as described herein) is justified based on the following legal grounds:

* *Consent*. You may consent to our use of non-essential cookies.
* *Legitimate Interests*. We process essential cookies to host, operate, maintain, and secure our Site.

Complaints. In the event you have concerns about our data processing, you have the right to file a complaint with your data protection authority:

* For data protection authorities in the EU, please see here: <https://edpb.europa.eu/about-edpb/about-edpb/members_en>.
* For the data protection authority in Switzerland, please contact the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home.html>).
* For the data protection authority in the UK, please contact the Information Commissioner’s Office ([www.ico.org.uk](http://www.ico.org.uk)).

We would, however, appreciate the opportunity to deal with your concerns before you approach a data protection authority with a complaint, and invite you to contact us in the first instance.

1. **COOKIE POLICY UPDATES**

We reserve the right to amend this Cookie Policy at any time. We will notify you if this Cookie Policy is amended by updating the “Last Updated” section listed above. It is your responsibility to periodically review the Cookie Policy to determine whether any amendments have been made hereto. Your use of the Sites, and continued use of the Sites after any amendments are made to this Cookie Policy, signifies your consent to this Cookie Policy and any amendments hereto. We may, in our sole discretion, provide you communications, including via email or text messages, about changes to our Cookie Policy; however, such communications do not abrogate or otherwise limit your responsibility to periodically review this Cookie Policy to determine whether any amendments have been made hereto.

1. **CONTACT US**

To prevent THE COMPANY FROM using certain Cookies and Other Online Tracking Technologies, YOU CAN CHANGE YOUR BROWSER SETTINGS IN ACCORDANCE WITH THE INSTRUCTIONS BELOW OR BY USING OUR COOKIE PREFERENCE CENTER, where AVAILABLE, ON THE FOOTER OF OUR SITE.

If you have questions regarding this Cookie Policy or our handling of your personal information, would like to request more information from us, or would like to exercise a data privacy right, please contact us at the following: (phone) 1 (800) 776-4488, (email) dataprotection@rpminc.com or by using our [interactive webform](https://www.rpminc.com/contact-rpm).

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